

June 12, 2020

Via Email

Chrischanda S. Smith, Branch Chief
Construction Services Division, Center 3
General Services Administration
Office of Acquisition
chrischanda.smith@gsa.gov

**Re: 1800 F Collocation, Auditorium, and Childcare Center Project
Contract No. 47PM1119C0006**

Ref: Response to CURE Notice – Remobilization Plan and Fan Coil Unit Work

Dear Ms. Smith:

On behalf of CAC-Motir Joint Venture, LLC (“CAC-Motir”), we provide the following response to GSA’s Cure Notice dated May 29, 2020.

A. Remobilization Plan and Schedule

CAC-Motir will remobilize on June 29, 2020 in accordance with the remobilization plan set forth below, and CAC-Motir will proceed to complete the remaining work on the above-referenced contract in accordance with the schedule attached herewith. CAC-Motir will complete all work on or before September 20, 2020, the current completion date under PS0004.

CAC-Motir plans to mobilize as follows:

- On or before June 22, 2020, CAC-Motir will notify GSA and affected subcontractors and vendors that work at the jobsite will resume on June 29, 2020.
- On or before June 26, 2020, CAC-Motir will inspect the jobsite to ensure all relevant areas are ready and prepared for the resumption of work activities.
- On June 29, 2020, work will resume with A&A Construction Group, LLC beginning their work according to the updated project schedule (attached).
- Also on June 29, 2020, Custom Glass will begin receiving window wall material, after which it will proceed with its work in accordance with the updated project schedule (attached).
- All other work necessary to completion of the project will proceed thereafter in accordance with the updated project schedule (attached).

B. HVAC

CAC-Motir maintains that it has complied with all of the requirements of the Contract with respect to HVAC conditions. CAC-Motir acknowledges GSA has directed CAC-Motir “to proceed with design, and upon approval of design, construction to provide adequate HVAC through the project areas included as part of this contract” (April 30, 2020 GSA Letter), which directive GSA referenced to FAR 52.243-1 in its letter of May 20, 2020. However, CAC-Motir maintains that the design already provided to GSA provides for adequate HVAC through the project areas included within the Contract at a building standard level. As such, CAC-Motir already has complied with GSA’s directive.

Without prejudice to CAC-Motir’s rights to seek an equitable adjustment and/or reasonable compensation for work outside the scope of the Contract, if GSA identifies a specific standard to which it would like spaces in rooms 2242, 3242, 4242 and 7240 to be conditioned, CAC-Motir will provide a design for GSA’s approval to meet such other standard as GSA may identify.

Sincerely,

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Tillman J. Finley

Enclosures

Cc: Emmanuel Irono (b) (6)@motirservices.com
Patricia Plummer (b) (6)@capitolaircare.com
Lewis Askew (b) (6)@tiberhudson.com
Eric Anderson (b) (6)@warnercon.com
Jim Merlene (b) (6)@warnercon.com
Tony Warner, II (b) (6)@warnercon.com
Claire Watkins (claire.watkins@gsa.gov)
Aaron Hassinger (aaron.hassinger@gsa.gov)
Chris Hudson-Boyd (christopher.hudson-boyd@gsa.gov)
Ashley Abdullah (ashley.abdullah@gsa.gov)
Kai Goodrich (guy.goodrich@gsa.gov)